

LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.
JOSEPH P. GARIN, ESQ. (NV Bar No. 6653)
LISA J. ZASTROW, ESQ. (NV Bar No. 9727)
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500
(702) 382-1512 – fax
jgarin@lipsonneilson.com
lzastrow@lipsonneilson.com

*Attorneys for Defendant
Springel & Fink, LLP*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MENDOTA INSURANCE COMPANY, a
Minnesota Corporation,

Plaintiff,

v.

MCCORMICK BARSTOW LLP, a
California limited-liability partnership;
WADE M. HANSARD, ESQ., an individual;
SPRINGEL & FINK LLP, a California
limited-liability partnership; and MICHAEL
R. MERRITT, ESQ., an individual

Defendants.

CASE NO.: 2:17-cv-02505-MMD-PAL

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS'
RESPONSE TO PLAINTIFF'S
COMPLAINT**

Plaintiff MENDOTA INSURANCE COMPANY ("Plaintiff"), Defendant SPRINGEL & FINK, LLP ("Springel"), and Defendant MCCORMICK BARSTOW, LLP by and through their respective counsel, hereby agree as follows:

IT IS HEREBY STIPULATED, that the deadline for Defendants to file a Response to Plaintiff's Complaint [ECF No. 1], which Plaintiff filed on September 26, 2017, shall be extended up to and including February 8, 2018.

The response by Defendant Springel was due on December 27, 2017 and the new deadline will be February 8, 2018. The response by Defendant McCormick Barstow was due on January 8, 2018, and the new deadline will be February 8, 2018.

1 Other Defendants have been served in this matter, yet not all Defendants have
2 obtained counsel or otherwise appeared.

3 The Plaintiff is desirous to provide a global extension of time to respond to the
4 complaint to each Defendant, thus Springel, McCormick Barstow and the Plaintiff agree
5 that the extension to respond to the Complaint includes each named Defendant in this
6 action that has been served.

7 This is the First stipulation for extension of time to file a response.

8 Good cause exists for the extension. Many of the Defendants and counsel for the
9 Defendants were out of the office during the holidays, necessitating the extension.
10 Additionally, given there are multiple Defendants involved, the parties jointly believe that
11 additional time is necessary to finalize and coordinate responses. Thus, the parties are
12 requesting additional time without incurring unnecessary litigation fees and costs.

13 The parties have entered into this agreement in good faith and not for purposes
14 of delay. This is the parties' way of accommodating one another given the nature of the
15 claims involved.

16 DATED this 2nd day of January, 2018.

DATED this 2nd day of January, 2018.

17 LIPSON, NEILSON, COLE, SELTZER
18 & GARIN, P.C.

KOLESAR & LEATHAM

19 */s/ Lisa J. Zastrow*

/s/ William D. Schuller

20 Joseph P. Garin, Esq. (Bar No. 6653)
21 Lisa J. Zastrow, Esq. (Bar No. 9727)
22 9900 Covington Cross Drive, Suite 120
23 Las Vegas, Nevada 89144
Attorneys for Defendant
Springel & Fink, LLP

Alan J. Lefebvre, Esq. (Bar No. 848)
24 William D. Schuller, Esq. (Bar No. 11271)
25 400 S. Rampart Blvd., Suite 400
26 Las Vegas, Nevada 89145
Attorneys for Plaintiff
Mendota Insurance Company

1 DATED this 2nd day of January, 2018.

2 ALVERSON, TAYLOR
3 MORTENSEN & SANDERS

4 /s/ *Karie N. Wilson*

5 Karie N. Wilson, Esq. (Bar No. 7957)
6 6605 Grand Montecito Pkwy, Ste. 200
7 Las Vegas, Nevada 89149
8 *Attorneys for Defendant*
9 *McCormick Barstow, LLP*

10 **ORDER TO EXTEND DEFENDANTS' RESPONSE TO PLAINTIFF'S COMPLAINT**

11 IT IS SO ORDERED.

12 DATED this 5th day of January, 2018.

13 
14 UNITED STATES MAGISTRATE JUDGE